## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,	) ) )
Plaintiff,	Civil Action No. 18-cv-5587
v.	) Hon. John Z. Lee
EQUITYBUILD, INC., EQUITYBUILD FINANCE, LLC, JEROME H. COHEN, and SHAUN D. COHEN,	) Magistrate Judge Young B. Kim )
Defendants.	) ) )

## MOTION FOR EXTENSION

Kevin B. Duff, as the receiver ("Receiver") for the Estate of Defendants EquityBuild, Inc., EquityBuild Finance, LLC, their affiliates, and the affiliate entities of Defendants Jerome Cohen and Shaun Cohen, respectfully requests that this Court enter an order granting him an additional fourteen days to file his response to the motion to intervene. (Dkt. No. 1065) In support of his motion, the Receiver states as follows:

- 1. On October 21, 2021, certain unspecified investor-lenders moved to intervene (Dkt. No. 1065) seeking relief from provisions of the Order Appointing Receiver (Dkt. No. 16) imposing a stay on claims asserted against receivership entities.
- 2. On October 22, 2021, this Court ordered that a response to the motion to intervene be filed on or before November 8, 2021. (Dkt. No. 1068)
- 3. Counsel for the Receiver and counsel for the putative intervenors have been negotiating a stipulation and order that would partially grant the relief sought, but are still finalizing the language of that proposed stipulated order.

4. Accordingly, the Receiver respectfully requests that the response to the motion to intervene be extended by fourteen (14) days to November 22, 2021. If a stipulation and proposed agreed order is available in advance of that date, a copy will be promptly tendered to the Court.

WHEREFORE, the Receiver requests a fourteen-day enlargement of time, from November 8, 2021 to November 22, 2021, to file a response to the motion to intervene.

Dated: November 8, 2021 Respectfully submitted,

s/ Michael Rachlis
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## **CERTIFICATE OF SERVICE**

I hereby certify that I provided service of the foregoing Receiver's Motion for Extension, via the Court's CM/ECF system, to all counsel of record on November 8, 2021.

/s/ Michael Rachlis

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